

TEG EXHIBIT G

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

MAX MINDS, LLC,

Plaintiff,

V.

TRIANGLE EXPERIENCE GROUP, INC., et al.,

Defendants.

Case No.: 1:24-cv-00779-JPH-MG

DECLARATION OF KANDIS M. KOUSTENIS

I, Kandis M. Koustenis, declare as follows:

1. I am over the age of eighteen (18) and am competent to testify to the matters set forth in this declaration. This declaration is made based on my personal knowledge.
2. I am a Shareholder in the law firm of Bean, Kinney & Korman, P.C. and have been in the private practice of law for over 25 years.
3. I am counsel for Defendant Triangle Experience Group, Inc. (“TEG”) in this matter before the Court.
4. In its “Motion for Modification or Clarification” filed with the Court on September 13, 2024 (Dkt 76) (“Max’s Motion” or the “Motion”), Max Minds, LLC (“Max”) makes allegations relating to a past, unrelated case involving TEG.
5. Max’s Motion also claims that “in the meet and confer conversation prior to the filing of this motion,” counsel for TEG, Richard Kelley, “who was also TEG’s counsel in the Hadron case” “confirmed” that TEG “still has Hadron’s source code.” (*Id.* at 7.) This statement is false. Mr.

Kelley never made such a statement, but instead told Max's counsel that he could not, and would not, answer questions about Hadron source code or software.

6. During a later meet and confer conference with counsel for Max on September 17, 2024, TEG's counsel asked Max to please identify the "counsel for Hadron" who allegedly stated that "TEG still has Hadron's source code," (Dkt 76 at 7), but counsel for Max refused to answer the question. Mr. Kelley further asked Mr. Rothman to retract and correct Max's false statement that TEG was in possession of Hadron's source code. Mr. Rothman refused.

7. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 20, 2024


Kandis M. Koustenis